

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	13 Cr. 414 (SHS)
Plaintiff,	:	
-against-	:	
KEYEWANIE BLACKLEDGE, et al.,	:	<b>NOTICE OF MOTION BY</b>
Defendants.	:	<b>KEYEWANIE BLACKLEDGE</b>

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SIRS:

PLEASE TAKE NOTICE, that upon the annexed affirmation of John F. Kaley, attorney for defendant **KEYEWANIE BLACKLEDGE**, dated April 15, 2014, the Declaration of Keyewanie Blackledge dated April 15, 2014 and all prior proceedings heretofore had herein, the undersigned will move this court, at the United States Courthouse located at 500 Pearl Street, New York, New York on the 15<sup>th</sup> day of April, 2014 or such other time convenient to the court for the following relief:

1. An Order pursuant to Rule 12(b)(3)(C) of the Federal Rules of Criminal Procedure Suppressing Physical evidence on the grounds that any items recovered were the product of an unlawful "stop and frisk," an unlawful arrest, and custodial interrogation in violation of *Miranda*;
2. An Order pursuant to Rule 12(b)(3)(C) of the Federal Rules of Criminal procedure Suppressing statement evidence, on the grounds that any alleged statements were the product of an unlawful "stop and frisk" and an unlawful arrest, and because the alleged statements were not voluntary, were the result of custodial interrogation and were made without the defendant having been advised of his *Miranda* rights;

3. An Order directing the government to disclose to the defendant any and all acts which the government would seek to introduce against the defendant pursuant to Federal Rule of Evidence 404(b) in such sufficient and reasonable time that the defendant may make a 404(b) motion to preclude the introduction of such evidence;

4. An Order directing disclosure of any Brady material;

5. An Order permitting the defendant to seek further particulars as further discovery is reviewed and/or provided pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure should that become necessary;

6. An Order permitting Keyewanie Blackledge to make such other and further motions as may become appropriate and to join in the motions of his co-defendants insofar as they may be applicable to him;

7. Such other and further relief as to this Court may seem just and proper

Dated: New York, New York  
April 15, 2014

Yours etc.,

/s/  
John F. Kaley (JFK: 3598)  
Doar Rieck Kaley & Mack  
217 Broadway, Suite 707  
New York, New York 10007  
Karen H. Charrington, Associate Counsel  
*Attorney for Keyewanie Blackledge*

To: Clerk of the Court (ECF)  
AUSA Christopher DiMase (via ECF and e-mail)  
All defense counsel (via ECF)